

6. HAZARDOUS SUBSTANCES, HAZARDOUS WASTES, AND PETROLEUM PRODUCTS

6.1 Introduction

In October 1992, Congress passed the Community Environmental Response Facilitation Act (CERFA) to amend CERCLA. The enactment was in response to the adverse effects of closing Federal facilities on the economies of local communities and, especially, to the delays in cleanup of contaminated property. The delays in cleanup were impeding the transfer of property for private development. The intent of CERFA is to facilitate economic development by requiring Federal agencies to identify uncontaminated parcels that could be separated from contaminated properties and transferred (sold or leased) quickly to the private sector. CERFA imposes several additional requirements. It adds petroleum products and their derivatives as contaminants or pollutants that must be considered. It prescribes a process for identifying uncontaminated parcels (discussed in Chapter 12). It requires EPA or the appropriate state to concur in the identification of uncontaminated parcels. It mandates notification to the appropriate state of a property at which closure will take place and for which a lease is being offered if hazardous substances and petroleum products were stored, released, or disposed.

6.2 Drivers for the Requirements

CERCLA § 120(h)(1) and (3), implemented via EPA regulations at 40 CFR Part 373, impose a reporting requirement for hazardous substances and certain hazardous wastes. GSA regulations at 41 CFR 101-47.202-2(b)(10) reiterate the CERCLA § 120(h)(1) and (3) requirements. BLM regulations at 43 CFR 2372.1 require reporting of the extent to which contamination has occurred and decontamination has taken or will take place. Conversely, CERCLA § 120(h)(4) requires identifying uncontaminated parcels of land. CERCLA § 120(h)(5) requires notification of the leasing of DOE real property which has been contaminated and where Government operations will cease.

6.3 Requirements in Real Property Transfers

6.3.1 The Requirements

The overall procedures for meeting the CERCLA § 120(h)(1), (3), (4), and (5) requirements are depicted in Exhibit 6-1. Exhibit 6-2 shows the flow chart for the CERCLA § 120(h)(1) and (3) procedures. If 1,000 or more kilograms, or an amount equal to or greater than the reportable quantity (RQ), whichever is greater, of a hazardous substance (excluding petroleum products) was stored for one year or more, or if an amount equal to or more than the RQ was released or disposed on the property, CERCLA § 120(h)(1) and (3) require reporting of the information (see Exhibit 6-2). The CERCLA § 120(h)(1) and (3) reporting requirements are further discussed in § 6.9 and § 6.10 below. Note that the information to be reported for fulfilling CERCLA § 120(h)(1) and (3) need be complete only to the extent that it is available on the basis of a complete search of DOE files (40 CFR 373.1). Contamination of a property must be reported as well as any remedial action that has been, is being, or will be taken (see § 6.8, § 6.9, and § 6.10). Conversely, parcels of uncontaminated land must also be identified under CERCLA § 120(h)(4) (see § 6.4.3). CERCLA § 120(h)(5) requires DOE to notify states about the leasing of properties that are being closed and have been contaminated with hazardous substances or petroleum products or their derivatives.

6.3.2 Definitions and Their Implications

The term "hazardous substances," as used in this guidance document, is defined as any one of the substances listed in 40 CFR 302.4 (Table 302.4). In accordance with CERCLA § 101 (14), Table 302.4 is effectively a compilation of hazardous substances from multiple statutory sources, including: the Clean Air Act, Clean Water Act, Resource Conservation and Recovery Act (RCRA), and Toxic Substances Control Act. Because

Exhibit 6-1

Procedures for CERCLA Section 120(h) Reporting

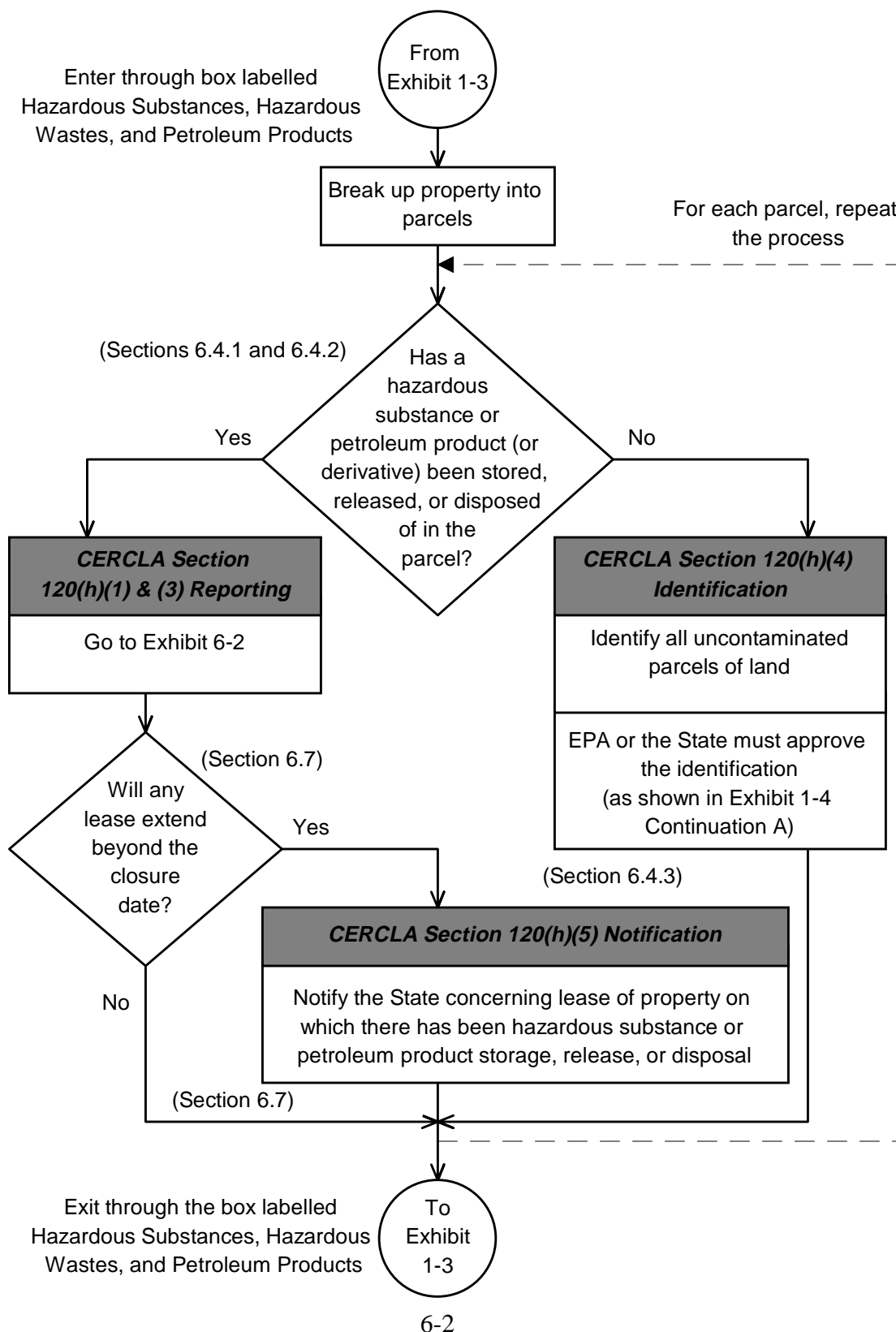
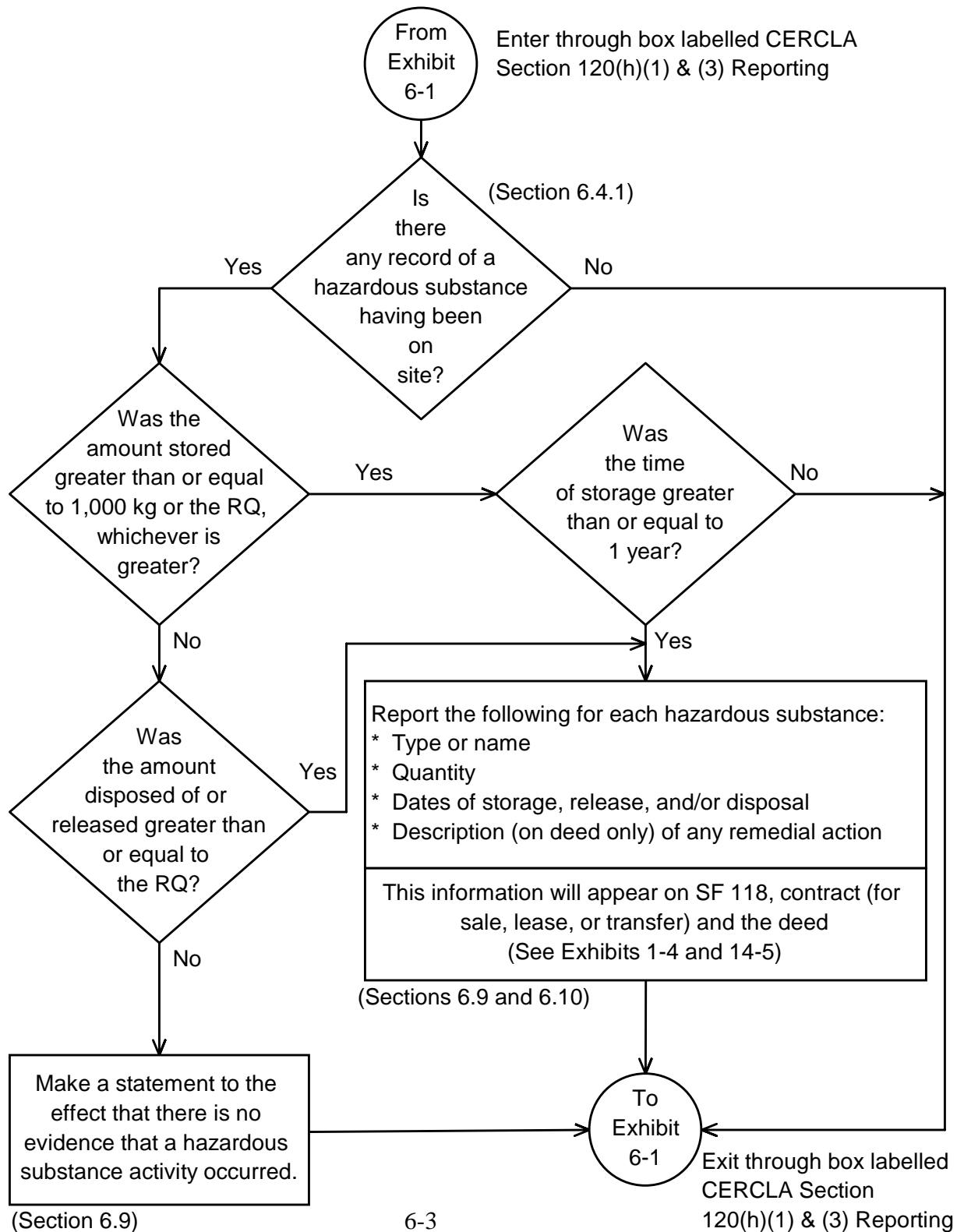


Exhibit 6-2
Procedures for CERCLA Section 120(h)(1) & (3) Reporting



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hazardous substances in the contexts of underground storage tanks, radioactive substances, PCBs, and asbestos have been singled out for special treatment by non-CERCLA requirements, these particular topics are specifically discussed in Chapters 7, 8, 9, and 10, respectively.

"Hazardous wastes" are a subset of hazardous substances regulated under RCRA and defined in the implementing regulations at 40 CFR 261 Subparts C and D. A hazardous waste is one that either exhibits a hazardous characteristic (Subpart C) or is listed (Subpart D). Facilities that treat, store, or dispose of hazardous waste (and meet other waste volume and accumulation time criteria) are subject to permitting requirements (40 CFR 270). The transfer of RCRA permits is discussed in Chapter 11. All listed hazardous wastes are designated as Hazardous Substances under CERCLA at 40 CFR 302.4 (Table 302.4), as are wastes that exhibit any of the characteristics listed in 40 CFR 261.20-24 [40 CFR 302.4(a) and (b)].

The term "petroleum products and their derivatives" is defined by neither CERCLA nor CERFA. However, a practical definition of the term can be adopted from the RCRA implementing regulations. Under the 40 CFR 280.12 definition for a regulated substance, the term is defined as "petroleum, including crude oil or any fraction thereof that is liquid at standard conditions of temperature and pressure (60° Fahrenheit and 14.7 pounds per square inch absolute)."

The term "contaminant" is defined at CERCLA § 101(33). In brief, it is a substance, which after release into the environment and upon direct or indirect exposure, threatens the safety or health of living organisms. *De minimis* levels and cleanup levels are not defined. Cleanup levels are, typically, risk-dependent. The amount of acceptable risk, in turn, depends on the future use of a site. However, cleanup levels, risk analysis, and planning of the future use of DOE sites are beyond the scope of this guidance document.

Although the term "storage" is defined in 40 CFR Part 373 (see glossary), an accounting problem arises in keeping track of the rotating inventories of hazardous substances. For example, consider a large capacity tank of methylene chloride that is always filled whenever it is 25% empty. It is

conceivable that enough of the original hazardous substance that was first placed into the tank may be retained for a year, thus triggering the storage quantity threshold. To resolve the potential confusion, it is suggested that if the total capacity of the tank (or a rotating inventory of a hazardous substance in a supply room) is equal to the greater of either 1,000 kilograms or the RQ of the hazardous substance, then the storage threshold should be considered triggered.

6.3.3 Possible Areas of Confusion

Four areas of possible confusion in fulfilling the CERCLA § 120(h)(1), (3), (4), and (5) requirements are identified and addressed below. These four are summarized in Exhibit 6-3. First, while CERCLA § 120(h)(1) and (3) excludes petroleum products, CERCLA § 120(h)(4) and (5) specifically include petroleum products. To resolve possible confusion, it is suggested that data gathering include petroleum products in all of the records searches. However, petroleum products may be omitted from reporting on SF 118 and the deed.

Second, while thresholds are specified by EPA regulation for the reporting requirements of CERCLA § 120(h)(1) and (3) for hazardous substances, no such thresholds are specified for the identification and reporting requirements in CERCLA § 120(h)(4) and (5). The thresholds for the reporting requirements of CERCLA § 120(h)(1) and (3) for hazardous substances are specified by EPA at 40 CFR Part 373. EPA has no analogous implementing regulations for CERCLA § 120(h)(4) and (5). EPA has provided limited guidance in implementing CERCLA § 120(h)(4) (see EPA memorandum, "Military Base Closures: Guidance on EPA Concurrence in the Identification of Uncontaminated Parcels Under CERCLA § 120(h)(4)"). In this memorandum, EPA does not establish any threshold quantities but insists on a case-by-case determination of whether a parcel is uncontaminated. EPA's criterion is whether the storage, release, or disposal associated with past hazardous substance and petroleum product activities would be expected to pose a threat to human health or the environment. EPA suggests, "The decision-maker should apply best professional judgment based on the available information in

Exhibit 6-3. Comparison of the CERCLA § 120(h)(1), (3), (4) and (5) Requirements

Requirement	CERCLA § 120(h)(1)	CERCLA § 120(h)(3)	CERCLA § 120(h)(4)	CERCLA § 120(h)(5)
Brief Description	Include in the contract for sale or transfer, a notice of the types and quantities of hazardous substances stored ≥ 1 year, released, or disposed on the property and the time at which these activities took place.	Report on the deed the types and quantities of hazardous substances stored for ≥ 1 year, released, or disposed on the property and the time at which these activities took place.	Identification of uncontaminated parcels of land (i.e., land on which no contaminants were stored ≥ 1 year, released, or disposed of).	Notification to States of sites that are being closed and that are encumbered by a lease beyond the closure date and are contaminated (i.e., land on which contaminants were stored ≥ 1 year, released, or disposed of).
Contaminants Covered	Hazardous substances as found at 40 CFR 302.4 only.	Hazardous substances as found at 40 CFR 302.4 only.	Hazardous substances or petroleum product or its derivatives.	Hazardous substances or petroleum product or its derivatives.
Threshold Quantities	As specified by 40 CFR Part 373: the greater of 1,000 kg or the RQ for storage of ≥ 1 year; the RQ for release or disposal; and 1 kg for acutely hazardous waste.	As specified by 40 CFR Part 373: the greater of 1,000 kg or the RQ for storage of ≥ 1 year; the RQ for release or disposal; and 1 kg for acutely hazardous waste.	Not specified; the same thresholds specified by § 120(h)(1) & (3) are suggested. Also see § 6.3.3.	Not specified; the same thresholds specified by § 120(h)(1) & (3) are suggested. Also see § 6.3.3.
Information Source	Departmental files only; however, it is a best management practice to follow the most stringent data gathering requirements [found at § 120(h)(4)].	Departmental files only; however, it is a best management practice to follow the most stringent data gathering requirements [found at § 120(h)(4)].	Reasonably obtainable Federal, State, and local government records and other sources (interviews, physical inspection, sampling, and aerial photographs).	Not specified; however, it is a best management practice to follow the most stringent data gathering requirements [§ 120(h)(4)].
Types of Real Property Transfers Covered	All real property transfers regardless of whether ownership changes, including transfers between Federal agencies.	All real property transfers in which ownership changes, and transfers between Federal agencies.	Not specified.	Leases of real property after operations cease.

making determinations under CERCLA § 120(h)(4)." To provide some rough guidelines to resolve the confusion, it is strongly suggested that except for radioactive substances and asbestos-containing materials, the same thresholds that are specified for CERCLA § 120(h)(1) and (3) apply to CERCLA § 120(h)(4) and (5). For radioactive substances, the threshold quantities should be replaced by the RQ (see Chapter 8). For asbestos-

containing materials inside a building intended for human occupancy, the threshold quantities should be replaced by the presence of damage to asbestos-containing materials (see Chapter 10).

Third, while the information to meet CERCLA § 120(h)(1) and (3) requires a search of only DOE's files, the range of information sought to meet CERCLA § 120(h)(4) requirements must be

extended to include reasonably obtainable Federal, State, and local government records. Gathering of data from other information sources such as interviews and aerial photographs is covered in Chapter 12. There is no statutory limit or guidance on sources of information from which DOE must gather data to fulfill the requirements of CERCLA § 120(h)(5) with respect to contaminated property for which DOE must provide notification to a state about leasing. To resolve the possible confusion, it is suggested that the most stringent data gathering requirement [imposed by CERCLA § 120(h)(4)] also be applied to fulfilling the requirements of CERCLA § 120(h)(1), (3), and (5) also.

Fourth, be aware that CERCLA § 120(h)(1) and (3), (4), and (5) apply to different scenarios relative to Federal real property transfers. Section § 120(h)(1) covers contracts for real property sales or transfers regardless of ownership changes (e.g., leases). Section 120(h)(3) covers real property transfers in which ownership changes, including transfers between Federal agencies (see 55 FR 14208). Section 120(h)(4) is independent of the type of real property transfer. Section 120(h)(5) applies to leases that are in effect beyond the termination of DOE operations at a site.

6.4 Data Gathering

6.4.1 Sources of Records

You need to do a search of procurement records, delivery logs, U.S. Department of Transportation shipping manifests, inventory records, personal property transfer logs, and uniform hazardous waste manifests. Material Safety Data Sheets help to identify the types of hazardous substances but do not provide the information necessary to determine if the quantities stored exceed the thresholds. Because the thresholds for Superfund Amendments and Reauthorization Act § 311 and § 312 reporting (500 pounds for extremely hazardous substances and 10,000 pounds for all other hazardous chemicals) are far higher than that for CERCLA § 120(h)(1) and (3), the § 311 and § 312 reports are of limited use. There are also records and reports that are required under RCRA that can be searched to obtain information; these include any RCRA permits, the operating records, unmanifested waste reports, and biennial reports. (The last two types of reports are on EPA Form 8700-13B.) In accordance with 40 CFR 264.73, the operating records of a

RCRA facility include a description and the quantity of each hazardous waste, the location of each hazardous waste, results of waste analyses and determinations, and inspection records.

You also need to do a records search for leaks, spills, or releases. Reports of releases of amounts equal to or greater than the RQ (see 40 CFR 302.4, Table 302.4) must be made to the National Response Center and to the DOE Headquarters Emergency Operations Center (DOE Order 232.1). You can search DOE Occurrence Notification Reports to uncover hazardous substance spills. If there was ever a leak or spill, there was probably contamination. Searches for groundwater monitoring reports, closure reports, site investigations (e.g., RCRA Facility Investigation and CERCLA Preliminary Assessment/Site Investigation), site characterizations, corrective action plans, cleanup actions, and removal actions would also indicate whether certain parcels had been or could be contaminated.

Lastly, DOE's Office of Field Management (FM-20) has developed a Facilities Information Management System (FIMS) database that will include information on hazardous materials on DOE-owned, DOE-leased, GSA-assigned, and contractor-leased land, buildings, trailers, and other structures. As of August 1997, FM-20 was still working with DOE's field elements to populate unclassified data for hazardous substances (including radioactive substances).

6.4.2 Inspection

Unfortunately, records may not be available. Even when available, they may not provide all the information necessary for you to know whether the property is or was contaminated. Therefore, it may be necessary for you to have a physical inspection conducted. The most common ways to treat, store, or dispose of hazardous waste are in units that include drums (and other types of containers), tank systems, surface impoundments, waste piles, land treatment units, landfills, incinerators, other thermal units, and underground injection wells. Unmarked drums and unidentified containers with fluids, sludges, or solids should be opened and their contents checked. Sampling and analysis will be necessary to identify the contents and the concentrations of the ingredients. As part of the

physical inspection, you should look for signs of contamination -- dead or dying vegetation, dead animals (or the absence of fauna), and stained soil and discolored ground covering. Analyze samples taken from stained soil and discolored ground covering. You should seek the services of an environmental professional if you have any concerns about overlooking signs of contamination.

6.4.3 Identification of Contaminated and Uncontaminated Parcels

You can use the results of the inspection to determine what parts of the property are contaminated and what parts are uncontaminated. You can use the results of both the physical inspection and records search (for releases) for the identification of parcels contaminated to satisfy BLM requirements (see § 6.8). Inversely, the identification of uncontaminated parcels can be used to satisfy the CERCLA § 120(h)(4) requirements for DOE facilities being closed (see Exhibit 6-1). The identification of parcels of uncontaminated land is subject to concurrence by EPA for sites on the National Priorities List or by the appropriate state for all other sites.

EPA's ability to concur with the identification of uncontaminated parcels will depend on the information available concerning the current and historical uses of the parcel, the proximity of the parcel to sources of contamination requiring response actions, and the nature of the threat, if any, reasonably associated with the type of activity or contamination associated with the parcel (see EPA, 1994). EPA gives examples of three categories where it could concur on a parcel as being uncontaminated:

- (1) Housing areas where heating oil (a petroleum product) or household products (hazardous substances) have been stored, released, or disposed of, but there is no evidence of a threat to human health or the environment.
- (2) Stained pavement of roadways and parking lots where incidental releases of automotive fluids have occurred, but there is no evidence of a threat to human health or the environment.

- (3) Areas where there was licensed pesticide application, but there is no evidence of a threat to human health or the environment. (EPA may condition its concurrence on further information concerning the nature and quantities of pesticide or the results of sampling.)

6.5 Relationship to Environmental Baseline Survey

The information gathered about hazardous substances, hazardous wastes, and petroleum products on a facility should be included in an environmental baseline survey (see Chapter 12). You may conduct part of or the entire environmental baseline survey yourself. If you conduct your own environmental site assessment, it is recommended that you follow ASTM E-1528-93 Standard, "Standard Practice for Environmental Site Assessments: Transaction Screen Process." Alternatively, you may have an environmental professional, such as an environmental auditor, conduct the assessment in accordance with ASTM E-1527-94 Standard, "Standard Practice for Environmental Site Assessments: Phase I Environment Site Assessment Process."

6.6 Relationship to NEPA Documents

A NEPA document prepared for a proposed real property transfer should address the presence of any hazardous substances, hazardous wastes, and petroleum products. Examples of when these materials could be an issue include: (1) they are the subject of an enforcement, remediation, or removal action to be completed for the real property transfer; (2) there is a change in the risks or hazards when the property is transferred; or (3) the public or stakeholders express a concern about hazardous substances, hazardous wastes, or petroleum products. For example, if a facility which formerly stored flammable materials is proposed to be used for a homeless shelter, a discussion of how the hazard has been or will be removed should be included in associated NEPA documentation.

6.7 Leases

Because of complex legal issues involving real property law, EPA has not addressed the applicability of § 120(h)(1) to leases or easements

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(55 FR 14209). However, as the result of a strict interpretation and as a best management practice, it is recommended that the same information EPA requires for contracts (see Section 6.10) be incorporated into lease or easement agreements.

CERCLA § 120(h)(5) requires you to notify the appropriate state official(s) of any lease of DOE real property on which a hazardous substance or petroleum product (or its derivatives) has been stored beyond one year, disposed of, or released if the lease encumbers the property beyond the date of termination of operations on the property. The notification must be made before entering into the lease and must include information on the length of the lease, name of the lessee(s), and the uses that will be allowed under the lease. (See Exhibit 6-1).

6.8 Notice of Intention to Relinquish

If the real property being declared excess is withdrawn land, the Notice of Intention to Relinquish (to be prepared and submitted to the Bureau of Land Management) must include any information on the extent of contamination and measures that have been taken or will be taken for decontamination. As explained in § 1.6.2, contamination is one of the 13 items that must be addressed, although there is no specific standard form for providing the information.

6.9 GSA-Specific Requirements

If 1,000 or more kilograms, or an amount equal to or greater than the RQ, whichever is greater, of a hazardous substance (see 40 CFR 302, Table 302.4) has been stored for one year or more, or if an amount equal to or more than the RQ of a hazardous substance has been disposed of, spilled, or otherwise released on DOE property (see Exhibit 6-2), this information needs to be reported to the extent that it is available on the basis of a complete search of DOE files (40 CFR 373.1). Also, report the dates on which hazardous substances were stored, released, or disposed of in excess of the quantity and time thresholds. In addition, report any remedial action necessary to protect human health and the environment that has been taken or will be completed. Attach the report of hazardous substance activity and of any remedial action to the Standard Form 118 (Appendix A) for the property. If no hazardous substance activity took place at the

property, then the following statement must be attached to SF 118:

DOE has determined, in accordance with regulations issued by the Environmental Protection Agency at 40 CFR Part 373, that there is no evidence to indicate that hazardous substance activity took place on the property during the time the property was owned by the United States.

Also, GSA requires that the disposal agency (itself or DOE, as the case may be) insert this information into the Invitation for Bids/Offer to Purchase as well as the following statements (as prescribed in 41 CFR 101-47.304-14):

NOTICE REGARDING HAZARDOUS SUBSTANCE ACTIVITY:

The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or "Superfund") 42 U.S.C. section 9620(h).

The holding agency (i.e., DOE) advises that [provide information on the type and quantity of hazardous substances; the time at which storage, release, or disposal took place; and a description of the remedial action taken.]

All remedial action necessary to protect human health and the environment with respect to the hazardous substance activity during the time the property was owned by the United States has been taken. Any additional remedial action found to be necessary shall be conducted by the United States.

In the case where the purchaser is a potentially responsible party with respect to hazardous substances, you must modify the above statement to represent the liability of the potentially responsible party for any remedial action.

6.10 Requirements for the Contract and Deed

If 1,000 or more kilograms, or an amount equal to or greater than the RQ, whichever is greater, of a hazardous substance (see 40 CFR 302, Table 302.4) has been stored (see glossary) for one year or more, or if an amount equal to or more than the RQ of a

hazardous substance has been disposed of, spilled, or otherwise released on DOE property (see Exhibit 6-2), report the information on the contract (for sale, lease, or other transfer) and deed. Note that petroleum products are excluded. In particular, 40 CFR 373.3 and CERCLA § 120(h)(1) and (3) require you to report the following information on the contract (for sale, lease, or other transfer) and deed:

- (1) Name of the hazardous substance and its regulatory synonym; the Chemical Abstracts Service Registry Number; and the applicable RCRA hazardous waste number(s).
- (2) Quantity (in kilograms and pounds) of the hazardous substance (excluding petroleum products) stored for one year or more, or known to have been disposed of, spilled, or otherwise released on the property.
- (3) Dates on which the hazardous substance was stored, disposed of, or released.
- (4) Description of remedial action (if any).
[This description is not required by 40 CFR Part 373 but by CERCLA § 120(h)(3)(A)(i)(III) to be put on the deed only.]
- (5) The following statement: "The information contained in this notice is required under the authority of regulations promulgated under Section 120(h) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or "Superfund") 42 U.S.C. Section 9620(h)." [This statement is not required by CERCLA § 120(h)(1) or (3) but by 40 CFR 373.3 to be put on the contract (for sale, lease, or other transfer only).]

In addition, a covenant to the deed (not required for leases) must be attached if the property is not being transferred to a potentially responsible party with respect to the real property. The covenant must warrant the following pursuant to CERCLA § 120(h)(3)(A)(ii) and (iii):

- (1) *All remedial action necessary to protect human health and the environment from*

hazardous substances remaining on the property has been taken before the date of the property transfer. (Note: all remedial action has been considered taken if the construction and installation of an approved remedial design has been completed, and the remedy has been demonstrated to EPA (or State) to be operating properly and successfully. The carrying out of long-term pumping and treating, or operation and maintenance, after the remedy has been demonstrated to EPA (or State) to be operating properly and successfully does not preclude the property transfer.)

- (2) *Any additional remedial action found to be necessary after the date of property transfer shall be conducted by the United States.*
- (3) *Permission granting the United States access to the real property in any case in which remedial or corrective action is found to be necessary after the property transfer.*

See § 14.3.4 for how paragraph (1) above of the covenant statement may be deferred under CERCLA § 120(h)(3)(C).

6.11 Checklist

- ☐ Have there been any hazardous substances, hazardous wastes, or petroleum products (or their derivatives) on the real property? (If not, stop here.)
- ☐ Have the data gathered on the real property concerning hazardous substances, hazardous wastes, and petroleum products (or their derivatives) been included in the environmental site assessment or environmental baseline survey?
- ☐ If hazardous substances, hazardous wastes, or petroleum products (or their derivatives) are an issue in an environmental assessment or environmental impact statement for a real property transfer, have the data gathered on the real property concerning hazardous substances,

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hazardous wastes, and petroleum products been included?

- ☐ If the real property is being offered for lease, have the appropriate State officials been notified as described in § 6.7?
- ☐ If the real property being declared excess is withdrawn land, have data on the extent of contamination and decontamination measures been included in the Notice of Intention to Relinquish to the Bureau of Land Management?
- ☐ Have the data gathered on the real property being declared as surplus concerning hazardous substances, hazardous wastes, and petroleum products been included in the Invitation for Bids/Offers described in § 6.9?
- ☐ Have the data gathered on the real property concerning hazardous substances, hazardous wastes, and petroleum products and the 40 CFR 373.3 information statement and the covenant been included in the contract (for sale, lease, or other transfer) and deed as described in § 6.10?
- ☐ If underground storage tanks could be present (or you are not sure), go to Chapter 7.
- ☐ If radioactive substances or contamination could be present (or you are not sure), go to Chapter 8.
- ☐ If polychlorinated biphenyls could be present (or you are not sure), go to Chapter 9.
- ☐ If asbestos could be present (or you are not sure), go to Chapter 10.

ASTM, 1993. "Standard Practice for Environmental Site Assessments: Transaction Screen Process," American Society for Testing and Materials E-1528-93 Standard, May 1993.

DOE, 1993. *RCRA and CERCLA Requirements Associated with the Sale or Transfer of DOE Property*, EH-231-022/1193, U.S. Department of Energy, Office of Environmental Guidance, RCRA/CERCLA Division, EH-413, November 1993.

EPA, 1994. "Military Base Closures: Guidance on EPA Concurrence in the Identification of Uncontaminated Parcels Under CERCLA § 120(h)(4)," Memorandum from Elliott P. Laws, Assistant Administrator, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response to Waste Management Directors (Regions I-X), Regional Counsels (Regions I-X), and the Federal Facilities Leadership Council, April 19, 1994.

6.12 References

ASTM, 1994. "Standard Practice for Environmental Site Assessments: Phase I Environment Site Assessment Process," American Society for Testing and Materials E-1527-94 Standard, June 1993.